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15 Attorneys for Plaintiffs

16 **UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF WYOMING**

18 **AUSTIN W. DUROSE, BY AND THROUGH**
19 **HIS NEXT FRIENDS AND NATURAL**
20 **PARENTS, WILLIAM K. AND MINDY E.**
21 **DUROSE, WILLIAM K. DUROSE, AND**
22 **MINDY E. DUROSE,**

23 **Plaintiffs,**

vs.

POWELL VALLEY HEALTHCARE, INC.;
POWELL HOSPITAL DISTRICT NO. 1;
POWELL VALLEY HOSPITAL; JEFFREY
HANSEN, M.D., AND JOHN DOES 1
THROUGH 10

Defendants.

13-CV-216-S

JOINT DISCOVERY PLAN

COME NOW Plaintiffs and Defendants, by and through their undersigned attorneys of record, and herewith submit the following proposed discovery plan, pursuant to Federal Rule of Civil Procedure 26(f)(3):

1. On December 9, 2013, counsel for the parties conducted their Rule 26(f) conference to discuss in good faith the pretrial phase of this case, considering the timing of Rule 26(a)(1) initial disclosures, discovery on the claims and defenses in the case, the possibilities for prompt settlement of the case, the existence of liability insurance and production of the insurance agreement, the subjects to be covered in discovery, the production of electronically stored information, and any claimed privilege regarding documents.

2. The parties represent that they do not know of any unique issues related to discovery in this medical negligence action. The parties do not anticipate any issues relating to disclosure or discovery of electronically-stored information in this case at this time.

3. There is no need to conduct discovery in phases or to otherwise limit discovery.

4. The parties propose the following pretrial schedule for the court's consideration:

Initial Disclosures	If not already accomplished, the parties shall disclose their Fed. R. Civ. P. 26(a)(1) material no later than January 13, 2014
Depositions, Interrogatories, Requests for Admission/Production	No more than ten depositions up to seven hours long may be taken by any party; no more than 25 interrogatories, including discrete subparts, may be served on any party; and, no more than 30 requests for production shall be served on any party. Relief to these limitations shall be by motion to this court absent written agreement by the parties
Motions to Amend Pleadings or Add Parties	March 3, 2014

Mediation	The parties should complete mediation as early as possible to avoid the unnecessary expenditure of judicial resources, to occur no later than June 2, 2014
Plaintiffs' Expert Witness Identification	Plaintiffs should identify experts and serve Rule 26(a)(2) reports no later than April 28, 2014
Defendants' Expert Identification	Defendants should identify rebuttal experts and serve Rule 26(a)(2) reports no later than June 2, 2014
Rebuttal	Plaintiffs shall identify rebuttal experts by June 17, 2014
Witness and Exhibit Lists	The parties shall file and serve witness and exhibit lists by July 1, 2014
Discovery Cut Off	All discovery, including depositions and written discovery, shall be completed by July 31, 2014
Dispositive Motions	Pretrial motions shall be made no later than July 31, 2014

5. There are no issues regarding service of process, jurisdiction or venue.
6. No specific motions are anticipated at this time.
7. Discovery can be completed pursuant to the schedule outlined above.

DATED this 6th day of January, 2014.

MOYERS LAW P.C.

By: /s/ Jon M. Moyers
Wyo. State Bar #6-3661

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2014, I electronically filed the foregoing with the Clerk of the Court using CM/ECF System which will send notification of such filing to the following:

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I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

No manual recipients.

By: /s/ Jon M. Moyers

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